

Our client, RDI Marketing Services, Inc. requests reconsideration of the FCC Rule and Order setting a 3% abandonment rate and requests the Commission adopt the industry standard of 5% abandonment measured monthly. Please see the following Petition for Reconsideration for the basis for this request.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:

Rules and Regulations Implementing the)	CG Docket
No. 02-278		
Telephone Consumer Protection Act of 1991)	

PETITION FOR RECONSIDERATION

Services, Inc.

Road

Roger W. Healey
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RDI Marketing

9920 Carver

Ohio 45242

Cincinnati,

513-984-5927

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of

Rules and Regulations Implementing the)
No. 02-278 CG Docket
Telephone Consumer Protection Act of 1991)

PETITION FOR RECONSIDERATION

RDI Marketing Services, Inc. ("RDI") hereby petitions the Federal Communications Commission ("FCC") pursuant to 47C.F.R. Section 1.429, to reconsider the Report and Order issued in the above - Caption Docket[1]. RDI asks the FCC to reconsider one issue: the FCC's adoption of the call abandonment rate of not more than 3 percent. RDI respectfully submits that the implementation of a call abandonment rate of not more than 3 percent will seriously damage businesses engaged in the telemarketing industry, such as RDI, and will not benefit consumers who are already sufficiently protected under other recently adopted rules of the FCC. RDI further submits that there is a complete lack of any record support for the conclusion that the newly adopted 3 percent standard will provide any additional benefits to consumers, and that any alleged benefit is greatly outweighed by the damage which will be caused to telemarketing businesses.

Accordingly, RDI requests that the FCC adopt the industry standard of 5 percent abandonment measured monthly.

I. BACKGROUND

RDI is a telemarketing company located in Cincinnati, Ohio that specializes in direct to consumer and business-to-business applications. RDI provides sales and customer support and fundraising services to many major corporations.

RDI respectfully submits that the implementation of a 3% abandonment rate will cause a significant loss of efficiency in its business operations, which will result in serious economic losses to RDI. Accordingly, a 3% abandonment rate, rather than the industry 5% abandonment rate, will have a very detrimental impact RDI's business, its more than 300 employees and its future.

II. ARGUMENT

In support of this Motion for Reconsideration, RDI incorporates by reference herein the Petition for Reconsideration previously filed with the FCC by InfoCision Management Corporation. RDI respectfully submits that InfoCision's Petition set forth arguments against the implementation of the 3% abandonment rate which hold true for it and most telemarketing companies across the country. Accordingly, RDI adopts same and urges their consideration.

III. CONCLUSION

For the reasons set forth herein and in the Petition for

Reconsideration of InfoCision Management Corporation, RDI respectfully requests that the FCC modify its Report and Order to change the first sentence of proposed 47CFR 64.1200(a)(6) to read " ... abandon more than 5% of all calls that are answered live by a person, measured over a 30 day period."

Services, Inc.

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Dated this 4th day of September, 2003.

69760.1

[1] Rules and regulations implementing the telephone consumer protection act of 1991, Report and Order, CG Docket No. 02-278 ("Report and Order").

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